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April 7, 2017

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

**Re: *Den Hollander v. CBS News Inc., et al.*, No. 16 Civ. 6624 (PAE)**

Dear Judge Engelmayer:

We represent Defendants CBS Broadcasting Inc. (erroneously sued as “CBS News Inc.”), Major Elliott Garrett, NBCUniversal Media, LLC (erroneously sued as “NBCUniversal News Group”), Lester Don Holt, Jr., Katharine Bear Tur, Charles David Todd, Andrea Mitchell, Hallie Marie Jackson, Kristen Welker, American Broadcasting Companies, Inc. (erroneously sued as “ABC News Division”), Thomas Llamas, Cecilia M. Vega, Jonathan David Karl, Cable News Network, Inc. (erroneously sued as “Cable News Network”), Abilio James Acosta, WP Company LLC (erroneously sued as “Washington Post Newsroom”), and Jenna Johnson (collectively, “Moving Defendants”) in the above-captioned matter.

Pursuant to Rule 3(J) of this Court’s Individual Rules and Practice in Civil Cases, we are writing to respectfully alert the Court that more than sixty days have passed since Moving Defendants’ motion to dismiss Plaintiff’s First Amended Complaint (Dkt. No. 93) was fully briefed and submitted. Moving Defendants’ reply brief in further support of their motion was filed on December 7, 2016. A Notice of Supplemental Authority was filed on January 12, 2017.

Two other motions to dismiss, raising similar arguments as to the various deficiencies in Plaintiff’s First Amended Complaint, have also been filed in this case, one by The New York Times Company, David Brooks, and Megan M. Twohey (the “Times Defendants”) (Dkt. No. 84) and one by PBS NewsHour (Dkt. No. 100). The Times Defendants’ motion was also fully briefed as of December 7, 2016. PBS NewsHour’s motion was fully briefed as of December 21, 2016.

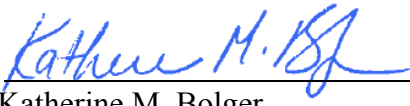
Thank you for your consideration.



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Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By:   
Katherine M. Bolger

cc: All Counsel of Record (via ECF)